

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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KRZYSZTOF PAJAK AND EWA PAJAK

Case No.: 07 CV 4502

Plaintiffs,

-against-

ANSWER

90 CHURCH STREET LIMITED PARTNERSHIP,
ALAN KASMAN DBA KASCO, AMBIENT
GROUP, INC., AMERICAN EXPRESS BANK,
LTD, AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS TRAVEL RELATED
SERVICES COMPANY, INC., ANN TAYLOR
STORES CORPORATION, BATTERY PARK
CITY AUTHORITY, BELFOR USA GROUP,
INC., BFP ONE LIBERTY PLAZA CO., LLC,
BFP TOWER C CO. LLC., BFP TOWER C
MM LLC., BLACKMON-MOORING-
STEAMATIC CATASTOPHE, INC. D/B/A BMS
CAT, BOSTON PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP.,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS, INC., ENVIROTECH
CLEAN AIR, INC., GENERAL RE SERVICES CORP.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO.,
LEHMAN BROTHERS HOLDINGS INC.,
LEHMAN BROTHERS, INC., LEHMAN
COMMERCIAL PAPER, INC., MCCLIER CORPORATION
MERRILL LYNCH & CO, INC., NATIONAL
ASSOCIATION OF SECURITIES DEALERS,
INC., NEW YORK CITY ECONOMIC
DEVELOPMENT CORPORATION, NEW YORK
CITY INDUSTRIAL DEVELOPMENT
AGENCY, NEW YORK CITY INDUSTRIAL
DEVELOPMENT CORPORATION, NOMURA

HOLDING AMERICA, INC., NOMURA
SECURITIES INTERNATIONAL, INC.,
ONE LIBERTY PLAZA, STRUCTURE
TONE (UK), INC., STRUCTURE TONE
GLOBAL SERVICES, INC., THE BOARD OF
MANAGERS OF THE ONE LIBERTY
PLAZA CONDOMINIUM (CONDO
#1178) THE ONE LIBERTY PLAZA
CONDOMINIUM (CONDO #1178),
TOSCORP, INC., TRAMMELL CROW
COMPANY, TRAMMELL CROW
CORPORATE SERVICES, INC., TUCKER
ANTHONY, INC., WESTON SOLUTIONS, INC.,
WFP ONE LIBERT PLAZA CO., L.P., WFP
ONE LIBERTY PLAZA CO., L.P., WFP
ONE LIBERTY PLAZA, CO. GP, CORP.,
WFP RETAIL CO., L.P., WFP TOWER A
CO. G.P. CORP., WFP TOWER A CO. L.P.
WFP TOWER B CO., G.P. CORP., WFP
TOWER B HOLDING CO., LP, WFP
TOWER B CO., L.P., AND WORLD
FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. (“Envirotech”), as and for their responses to the allegations set forth in the Complaint by Adoption (“Check-off Complaint”) related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech’s Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
September 14, 2007

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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